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11 REGAL STONE LIMITED and FLEET
12 MANAGEMENT LTD,

13 Plaintiffs,

14 vs.

15 LONGS DRUG STORES CALIFORNIA,
16 L.L.C., a California limited liability company,
17 LONGS DRUG STORES, L.L.C., a Maryland
18 limited liability company, LONGS DRUG
19 STORES CORPORATION, a California
corporation, CVS CAREMARK
20 CORPORATION, a Delaware corporation,
LOUIE CHESTER, an individual, and DOES 1–
21 20,

22 Defendants.

23) Case No. CV 11 4540 SC
24)
25) **[REVISED PROPOSED] ORDER**
26) **GRANTING PLAINTIFFS'**
27) **ADMINISTRATIVE MOTION TO FILE**
28) **PORTIONS OF PLAINTIFFS' FIRST**
29) **AMENDED COMPLAINT UNDER SEAL**
30) **AND FOR PROTECTIVE ORDER**
31)
32) **[L.R. 79-5(c) & 7-11]**
33)
34) Date: December 16, 2011
35) Time: 10:00 a.m.
36) Place: San Francisco Courthouse
37) Courtroom 1
38) 450 Golden Gate Avenue
39) San Francisco, California 94102
40)
41)

42 The Administrative Motion of Plaintiffs REGAL STONE LIMITED and FLEET
43 MANAGEMENT LTD (the “Plaintiffs”) to file portions of their First Amended Complaint (“FAC”)
44 under seal and for a protective order permitting Plaintiffs to serve the named defendants in this
45 lawsuit, including Defendant CVS CAREMARK CORPORATION (“Defendants”), with a complete
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1 and unredacted copy of the FAC and prohibiting Defendants from disclosing or otherwise making the
 2 FAC publicly available, ~~came on for hearing before this Court on December 16, 2011~~. Having
 3 considered the papers filed by the Parties ~~and the oral argument of counsel~~, and good cause appearing
 4 therefor,
 SC

5 IT IS HEREBY ORDERED AS FOLLOWS:

6 The Plaintiffs' Administrative Motion is GRANTED and:

7 1. The FAC shall be filed in the public record with paragraphs 16–18, 20, 30–31,
 8 35, 37, 39, 70, 99, and 107 partially redacted;

9 2. Plaintiffs shall serve a complete and unsealed copy of the FAC on Defendants;

10 3. The Parties shall be permitted to disclose the FAC to: (a) counsel (including
 11 their employees) who represent or advise them; (b) the officers, directors, and employees, including
 12 former employees, of the Parties who are reasonable necessary to assist with the litigation; (c) experts,
 13 including consulting experts; (d) the Judge, the Court and its personnel, at least with respect to the
 14 allegations contained in the FAC; (e) court reporters and their staffs; and (f) witnesses with relevant
 15 knowledge; and;

16 4. Prohibiting the parties from disclosing the FAC to individuals or entities not
 17 covered above, or otherwise making the FAC publicly available; and

18 5. Instructs the parties that: (a) when filing any papers with this Court, including,
 19 but not limited to, pleadings, motions, and declarations, which reference the partially redacted portions
 20 of paragraphs 16–18, 20, 30–31, 35, 37, 39, 70, 99, and 107 of the FAC, they are to keep the redacted
 21 portions redacted in the text of the filed papers, and (b) when attaching the FAC as an exhibit to any
 22 papers filed with this Court, the parties are to attach the partially redacted copy of the FAC that is filed
 23 in the public record.

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1 IT IS SO ORDERED.
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3 Dated: March 2, 2012, 2011
4 SC



HONORABLE SAMUEL CONTI
UNITED STATES DISTRICT COURT JUDGE

5
6 /s/ Joseph A. Walsh II

7 Respectfully submitted:
8 SAMUEL A. KEEBAL, JR., CASB No. 38014
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10 JOSEPH A. WALSH II, CASB No. 143694
11 *joe.walsh@kyl.com*
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21 Attorneys for Plaintiffs
22 REGAL STONE LIMITED and FLEET
23 MANAGEMENT LTD
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